

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

<b>IN RE: ANTOINETTE KITCHEN,</b>	)	
	)	
<b>Debtor.</b>	)	Chapter 13
	)	
	)	Case No.: 16-11359-BFK
	)	
<b>ANTOINETTE KITCHEN,</b>	)	
	)	
<b>Plaintiff,</b>	)	A.P. No. 16-01191
	)	
<b>v.</b>	)	
	)	
<b>WELLS FARGO BANK, NA d/b/a</b>	)	
<b>WELLS FARGO DEALER SERVICES,</b>	)	
	)	
<b>Defendant.</b>	)	
	)	

**MOTION TO EXCLUDE EXPERT WITNESS**

Wells Fargo Bank, NA, d/b/a Wells Fargo Dealer Services ("**WFDS**"), through the undersigned counsel, pursuant to Rule 104 of the Federal Rules of Evidence, hereby moves to exclude the use of any expert witness testimony on behalf of Plaintiff at the hearing on the Plaintiff's motion for allowance of fees on March 21, 2017.

The grounds for this motion are set forth in WFDS' Memorandum in Support of Motion to Exclude Expert Witness, which is being filed contemporaneously with this Motion.

WHEREFORE, WFDS hereby moves for the exclusion of any expert witness testimony on behalf of Plaintiff.

Respectfully submitted,

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/s/ J. David Folds  
J. David Folds, VSB # 44068  
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Counsel for Wells Fargo Bank N.A.

**CERTIFICATE OF SERVICE**

I hereby certify that on March 2, 2017, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified below via transmission of Notice of Electronic Filing generated by CM/ECF.

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/s/ J. David Folds  
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